

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO
SAVERIN, DUSTIN MOSKOVITZ, ANDREW
MCCOLLUM, CHRISTOPHER HUGHES
AND THEFACEBOOK, INC.,

Defendants.

CIVIL ACTION No.: 1:04-cv-11923
(DPW)

MARK ZUCKERBERG, and
THEFACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC, CAMERON
WINKLEVOSS, TYLER WINKLEVOSS, and
DIVYA NARENDRA,

Counterdefendants.

**DEFENDANTS AND COUNTERCLAIMANTS' RESPONSES TO PLAINTIFF
AND COUNTERDEFENDANTS' REQUESTS FOR THE PRODUCTION OF
DOCUMENTS AND THINGS**

Defendants and counterclaimants Mark Zuckerberg and TheFacebook, Inc., and Defendants Eduardo Saverin, Dustin Moskovitz, Andrew McCollum, and Christopher Hughes (collectively "Defendants") hereby respond to requests for the production of documents and things ("Request") by Plaintiff and Counterclaimant Defendant ConnectU

Request for Production No. 140

All documents sufficient to show the state and address of residence of Mark Zuckerberg, Eduardo Saverin, Dustin Moskovitz, Andrew McCollum, and Christopher Hughes.

Response to Request for Production No. 140

Defendants object to this request as compound, vague, and seeking irrelevant documents not reasonably calculated to lead to the discovery of admissible evidence. Defendants further object that this request seeks information beyond the scope of a proper request for production of documents, and purports to impose on Defendants an obligation to provide information in the nature of an interrogatory, which has not been properly propounded as an interrogatory, and further exacerbates Plaintiff's use of interrogatories in excess of the number permitted by Rule. Without waiving the general objections set forth above and subject to the specific objections stated herein, Defendants respond as follows: Mark Zuckerberg, Dustin Moskovitz, and Andrew McCollum currently reside in California; Eduardo Saverin currently resides in Boston; Christopher Hughes currently resides in Paris.

Request for Production No. 141

All documents sufficient to show the permanent address given by Mark Zuckerberg, Eduardo Saverin, Dustin Moskovitz, Andrew McCollum, and Christopher Hughes when they are called upon to do so.

Response to Request for Production No. 141

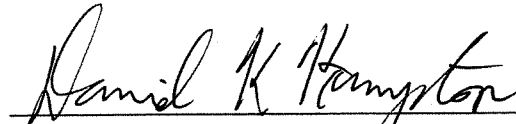
Defendants object to this request as compound, as vague in its use of the term "permanent address," and as seeking irrelevant documents not reasonably calculated to lead to the discovery of admissible evidence. Defendants further object that this request seeks

Defendants respond as follows: Defendants refer Plaintiff to Defendants' Response to Request for Production Nos. 1-37, 39-41, 47-49, 51-68, 72-95, 97, 100-105, 108-110, 112, 114-116, 124-140, 142-154, 156, 158-160, 162, 164, and 166-167.

DATED: May 31, 2005

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and THEFACEBOOK,
INC.

By their attorneys



Gordon P. Katz (BBO# 261080)
Daniel K. Hampton (BBO# 634195)
HOLLAND & KNIGHT, LLP
10 St. James Avenue
Boston, MA 02116
Telephone: (617) 523-2700
dan.Hampton@hklaw.com
gordon.katz@hklaw.com

Robert B. Hawk (*of counsel*)
HELLER EHRMAN LLP
275 Middlefield Road
Menlo Park, CA 94025
Telephone: (650) 324-7197